

CARB appreciates the opportunity to comment. We write to express our opposition to the proposed expansion of "supplier" definitions and the new biomass

The inclusion of [Hydrogen/Cement] importers under the MRR creates significant market uncertainty. Specifically, the proposed amendments fail to account for the administrative overhead required for entities that have not historically been part of the Cap-and-Trade ecosystem. This expansion threatens to increase costs for [Industry/Sector] without a proportional benefit to emissions transparency.

The proposed requirements for biomass-derived fuels are premature. Until CARB provides clear, simplified pathways for verifying the carbon intensity of diverse biomass feedstocks, these reporting mandates will result in inconsistent data and excessive third-party verification costs.

We urge CARB to:

- Delay the inclusion of new "supplier" categories until a comprehensive economic impact study is conducted.
- Establish a higher reporting threshold (de minimis) to protect small importers.
- Align biomass reporting with existing federal (EPA) standards to reduce duplicative reporting burdens.

Again please reconsider the amendments.

